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[Proposed] Attorneys for Kittusamy, LLP, Alleged Debtor

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

IN RE: KITTUSAMY, LLP, Alleged Debtor.	Case No. 15-13868-ABL Chapter 11

ANSWER TO INVOLUNTARY PETITION, CONSENT TO ENTRY OF ORDER FOR RELIEF, AND RESERVATION OF RIGHTS

Alleged Debtor Kittusamy, LLP ("Debtor" or "Kittusamy"), by and through its undersigned legal counsel, hereby answers the Involuntary Chapter 11 Petition filed against it on July 2, 2014 (the "Involuntary Petition") by petitioning creditors Moonshell, LLC ("Moonshell"), Xspectra, Inc. ("Xspectra"), Seven Hills Equipment, LLC ("SH Equipment"), and Venus Group, LLC ("Venus") (Moonshell, Xspectra, SH Equipment, and Venue group are collectively referenced herein as the "Petition Creditors") as follows:

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ANSWER TO INVOLUNTARY PETITION

Allegation No. 1: Petitioner(s) are eligible to file this petition pursuant to 11 U.S.C. § 303(b).

Answer to Allegation No. 1: Kittusamy denies this allegation. The claims of one or more of the Petitioning Creditors are subject to bona fide dispute as to liability and/or amount. Moreover, upon information and belief, the Petitioning Creditors are closely related entities that share common ownership and/or management and, as such, are the alter egos of each other and should not be considered separate creditors for the purposes of 11 U.S.C. § 303(b).

Allegation No. 2: The debtor is a person against whom an order for relief may be entered under title 11 of the United States Code.

Answer to Allegation No. 2: Kittusamy admits this allegation.

Allegation No. 3: The debtor is generally not paying such debtor's debts as they become due, unless such debts are the subject of a bona fide dispute as to liability or amount.

Answer to Allegation No. 3: Kittusamy denies this allegation. Although certain undisputed debts have not been paid in a timely manner, Kittusamy is generally current in the payment of its ongoing business obligations.

CONSENT TO ENTRY OF ORDER FOR RELIEF

Kittusamy consents to the entry of an order for relief under Chapter 11[1] upon which Kittusamy shall become a Chapter 11 debtor in possession. Although Kittusamy believes that the Involuntary Petition was improperly filed, it has determined that it is now in the best interest of the company and its creditors for Kittusamy to proceed with a voluntary Chapter 11 case.

[1] All references to "Chapter" and "Section" herein shall be to the Bankruptcy Code appearing in Title 11 of the U.S. Code; all references to a "Bankruptcy Rule" shall refer to the Federal Rules of Bankruptcy Procedure; and all references to a "Local Rule" shall refer to the Local Rules of Bankruptcy Practice of the U.S. District Court for the District of Nevada.

RESERVATION OF RIGHTS

Kittusamy expressly reserves all of its legal and equitable rights and remedies against the Petitioning Creditors, including any right Kittusamy may have to recover sanctions or damages pursuant to 11 U.S.C. § 303(i). Among other damages inflicted, the filing of the Involuntary Petition has severely disrupted Kittusamy's business operations and has caused Kittusamy to incur increased attorney fees in responding to the Involuntary Petition and preparing to proceed with a Chapter 11 case on an emergency basis.

DATED this 28th day of July, 2015.

KOLESAR & LEATHAM

By: /s/ *Bart K. Larsen, Esq.*

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CERTIFICATE OF SERVICE

1. On July 28, 2015, I served the foregoing ANSWER TO INVOLUNTARY PETITION, CONSENT TO ENTRY OF ORDER FOR RELIEF, AND RESERVATION OF RIGHTS)

2. I served the above-named document(s) by the following means to the persons as listed below:

(***Check all that apply***)

☒ **a.** **ECF System (*You must attach the "Notice of Electronic Filing," or list all persons and addresses and attach additional paper if necessary*)**

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I declare under penalty of perjury that the foregoing is true and correct.

Signed on (date): July 28, 2015.

/s/ Bart K. Larsen, Esq.
DECLARANT